

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

UNITED STATES OF AMERICA,

NO. CR19-006 RSL

Plaintiff

V.

DENISON ELLIS.

**(PROPOSED)
PROTECTIVE ORDER**

Defendant.

This matter having come before the Court on a Stipulated Motion for Entry of a Discovery Protective Order, the Court hereby enters the following:

DISCOVERY PROTECTIVE ORDER

A. Definitions

As used in this Order, the term “Protected Information” means any date of birth, Social Security number, driver’s license number, bank account number, credit card number, personal identification number, address, telephone number, name and/or location of employment, criminal history record, background check, victim identity, and/or any other similar information or number implicating a privacy interest of and belonging to an individual, co-defendant, business, partnership, or corporation.

1 As used in this Order, the term “Protected Material” means any document or other
2 record containing or reflecting Protected Information.

3 **B. Permissible Disclosure of Protected Information and Protected Material**

4 The United States will make available copies of the Protected Material to defense
5 counsel to comply with the government’s discovery obligations. Possession of the
6 Protected Material is limited to defense counsel, his investigators, paralegals, assistants,
7 law clerks, and experts (“members of the defense team”).

8 Members of the defense team may not provide copies of the Protected Material to
9 other persons, including Defendant herself. Members of the defense team may review
10 Protected Information and/or Protected Material with Defendant. Defendant may
11 visually inspect and review such documents but shall not be allowed to possess Protected
12 Information (such as unredacted copies of Protected Material, notes, copies, or
13 photographs of such Protected Material containing Protected Information). Defendant
14 may possess documents from which all Protected Information has been redacted.

15 Members of the defense team may review or discuss the contents of documents
16 containing Protected Material with any prospective witness, as long as they do not share
17 the unredacted documents, or share any Protected Information with any prospective
18 witness.

19 **C. Filing**

20 If any Protected Information or Protected Material is filed in court or otherwise
21 disseminated as part of litigation, the parties shall redact such information prior to filing;
22 unless, based on a party’s application prior to filing, the Court finds that an unredacted
23 filing is necessary and appropriate.

24 **D. Maintenance**

25 Member of the defense team shall keep any Protected Material secured whenever
26 the Protected Material is not being used in furtherance of their work in the above-
27 captioned case.

1 All documents containing Protected Material shall be returned to the
2 United States, or destroyed, once all charges are resolved by dismissal or by final
3 conviction. The provisions of this Order shall not terminate at the conclusion of this
4 prosecution.

5 **E. Modification**

6 The parties agree that this Protective Order may be modified, as necessary, by
7 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order
8 of the Court.

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10 DATED this 26⁺ day of February, 2019.
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14 ROBERT S. LASNIK
15 United States District Court Judge
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17 Presented by:
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19 /s/ Marie M. Dalton
20 MARIE M. DALTON
Assistant United States Attorney
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